

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

IN RE: Jeffrey Carr  
Christy Carr

CHAPTER 13  
CASE NO. 16-61082

Debtor(s)

**ATTORNEY FEE APPLICATION**

Comes now the Debtor's Attorney and makes application for additional Attorney's fees on the basis of the following information:

1. The Debtor(s) filed a bankruptcy petition before this Court on *May 27, 2016*, at which time the Debtor(s) executed a fee agreement whereby the Debtor's Attorney agreed to represent the Debtor(s) for a set fee. Specifically excluding other unanticipated litigation or motions.
2. That the Chapter 13 plan has been confirmed by order of this Court.
3. That the Debtor(s) agree that their Attorney is due additional fees in the amount of \$250.00 for representing them in a Response to Notice of Default.

Wherefore, the Debtor(s) and their Attorney hereby request the Court to enter an order confirming the additional Attorney's fees, and that said fees shall be added to the base gross and paid by the Chapter 13 Trustee.

Date: 11/15/2019

Jeffrey Carr  
/s/ Stephen E. Dunn  
Of Counsel

Christy Carr  
/s/ Stephen E. Dunn  
Of Counsel

Stephen E. Dunn, Esq.  
Counsel for Debtor(s)  
Stephen E. Dunn, PLLC  
201 Enterprise Drive, Suite A  
Forest, VA 24551

**UNITED STATES BANKRUPTCY COURT  
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**NOTICE OF HEARING ON DEBTORS' RESPONSE TO NOTICE OF DEFAULT  
AND ATTORNEY FEE APPLICATION**

Please take notice that the undersigned Counsel for the above-named Debtor(s), filed a Response to Notice of Default and an Attorney Fee Application, true copies of which are attached hereto, and shall submit the same to the Honorable Rebecca B. Connelly, U.S. Bankruptcy Judge, for approval on **January 30, 2020** at 9:30 a.m., or as soon thereafter as the parties may be heard, in the U.S. Bankruptcy Court, 1101 Court Street, Lynchburg, VA. Please plan to attend in order to protect your interest.

I do hereby certify that a copy of the Notice and Motion have been sent to the Chapter 13 Trustee by ECF Mail to the Debtor and all creditors by first class postage prepaid mail in this case on the after mentioned date.

Date: 11/15/2019

Jeffrey Carr  
/s/ Stephen E. Dunn  
Of Counsel

Christy Carr  
/s/ Stephen E. Dunn  
Of Counsel

Stephen E. Dunn, Esq.  
Stephen E. Dunn, PLLC  
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